

REMARKS

Claims 1 and 3-15 are pending in this application. By this Amendment, claim 1 is amended. No new matter is added. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

The Office Action, in paragraph 2, rejects claims 1 and 3-15 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,487,566 to Sundaresan. Applicants respectfully traverse this rejection.

Sundaresan fails to teach that the second code structure comprises a plurality of filter characteristics corresponding to a plurality of possible structural forms of the first code structure, and wherein the second code structure applies a filter corresponding to the structural form of the first code structure, as positively recited in amended claim 1. As discussed above, Sundaresan fails to teach choosing a transformation model for the filter, and further fails to teach applying a filter corresponding to the structural form of the first code structure/expression from among a plurality of filter characteristics corresponding to a plurality of structural forms.

In this way, the first code structure represented one of the plurality of structural forms of data may be manipulated by the invocation of a single second code structure representing a plurality of filters, each capable of filtering different types of structural forms of data. A single invocation, of a filter, therefore may successfully filter a number of structural forms of data while reducing the number of symbols required to execute filtering. For example, as discussed on page 9, lines 10-12 of Applicants' disclosure, a "+" operator can take different semantics depending on the data structure, e.g., arithmetic addition, string concatenation, set union, etc. A "+" operator, therefore, as a single code structure, is able to express a plurality of different filters, depending on structural form, in a single second code structure, as

discussed on page 10, lines 1-9. Sundaresan, as discussed above, fails to teach multiple filters associated with a second code structure.

For at least the above reasons, Sundaresan cannot reasonably be considered to teach or suggest the combination of all of the features in at least independent claim 1. Claims 3-15 are also neither taught, nor would they have been suggested, by the applied reference for at least the respective dependence of these claims on allowable independent claim 1, as well as for the separately patentable subject matter that each claim recites. Accordingly, reconsideration and withdrawal of the rejections of the subject matter of claims 1 and 3-15 under 35 U.S.C. §102(e) are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-15 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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